

# EXHIBIT 2

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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In the Matter of the Application of Kathryn  
Tewson,

Motion Seq. 001

Petitioner,

Index No. 151427/2023

For an Order to Preserve Evidence and for  
Pre-Action Disclosure Pursuant to CPLR § 3102(c),  
and for a Temporary Restraining Order Pursuant  
to CPLR § 6313(a),

**AFFIDAVIT OF  
ALLISON NIXON**

- against -

DoNotPay, Inc. and Joshua Browder,

Respondents.

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STATE OF NEW JERSEY )  
                          )  
                          )ss:  
COUNTY OF BERGEN     )

1. I am the Chief Research Officer at Unit 221B. I perform research & investigative work for our clients primarily in relation to cybercrime. I'm quoted in countless news articles pertaining to cybercrime, and I have appeared in two documentaries about cybercrime- "The Teenager Who Hacked Twitter, The New York Times Presents: S1E5" and "Keepers of the Caliphate & SIM Kids, VICE on Showtime Series Premiere". I have worked in information security since 2011, and worked in cybercrime research as my primary job description since 2015.

2. I have worked with Kathryn Tewson in an investigative capacity many times in the past two years. I have had numerous opportunities to observe her

NYSCEF DOC. NO. 66

methodologies in this time, and have come to appreciate her thoroughness and tenacity as an investigator. Her methodologies are consistent with those used by specialists in our field. Numerous times I was tasked with performing detailed audits of her work, as is the norm in our field. It has always been high quality.

3. Ms. Tewson is a highly skilled OSINT investigator. She stays up-to-date on the latest industry techniques, and is always on the lookout for new tools and methods.

4. Ms. Tewson is a highly competent technical investigator. Every time I have worked with her, her conclusions are consistently sound and well supported by evidence. I am confident enough in her work that I have endorsed it as the basis for taking real world action, and in these scenarios the outcome has been positive every time. She has my highest recommendation.

5. I declare under penalty of perjury that the record to which this declaration is attached is the same record on which Keith S Kaplan performed a notarial act and before whom I appeared by means of communication technology on March 21<sup>st</sup>, 2023.

Dated: March 21, 2023

DocuSigned by:

Allison Nixon

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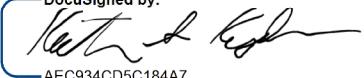
Allison Nixon

Duly sworn to before me on

the 21st day of March, 2023

I, Keith S Kaplan witnessed, by means of communication technology, Allison Nixon sign the attached record and declaration on March 21<sup>st</sup>, 2023.

DocuSigned by:



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Keith Kaplan, Notary Public  
State of New Jersey  
Commission #2383070  
Expires March 4, 2024

DocuSigned by:



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-against-

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Respondents.

**Affidavit / Certificate of Conformity  
Pursuant to NYS CPLR § 2903(c)**

**Index. No. 151427/2023**

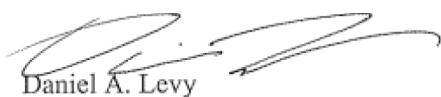
STATE OF NEW JERSEY, COUNTY OF BERGEN:

I, Daniel Levy, do hereby affirm that I am am admitted to practice before the Appellate Division, First Department and reside in the State of New Jersey.

I make this certification for the purposes of compliance with New York State Civil Practice Law & Rules Section 2903(c) with regard to the Affidavit of Allison Nixon, a copy of which is annexed hereto, to be filed with the Clerk of the Court of the Supreme Court of New York County, State of New York.

Said Affidavit, acknowledged and sworn by Allison Nixon before a Notary Public in and for the State of New Jersey, and said Affidavit being therein sworn in the State of New Jersey, is and appears to be, based upon my review of said document and notarization thereof, in conformity with the laws of the State of New Jersey for the making of an affidavit and the notarization thereof.

Dated: Teaneck, New Jersey  
March, 21, 2023



Daniel A. Levy